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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

In re:

LIQUID ALUMINUM SULFATE  
ANTITRUST LITIGATION

2:16-md-2687 (JLL) (JAD)  
(MDL 02687)

**Return Date: March 20, 2017**

***ORAL ARGUMENT REQUESTED***

*Document Electronically  
Filed and Served Via ECF System*

**This Document Relates to:** *Putative Class  
of Indirect Purchaser Plaintiffs*

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**NOTICE OF DEFENDANT MILTON SUNDBECK'S MOTION TO  
DISMISS INDIRECT PURCHASER PLAINTIFFS' CONSOLIDATED  
CLASS ACTION COMPLAINT PURSUANT TO FED. R. CIV. P.  
12(b)(2) AND 12(b)(6)**

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**PLEASE TAKE NOTICE** that on March 20, 2017, at 9:30 a.m., or at such other date and time as may be set by the Court, the undersigned attorneys for Defendant Milton Sundbeck shall move before the Honorable Jose L. Linares, U.S.D.J., in the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, for an Order dismissing the Indirect Purchaser Plaintiffs' Consolidated Class Action Complaint [Dkt. No. 242] against Milton Sundbeck with prejudice pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6).

**PLEASE TAKE FURTHER NOTICE** that, in support of this Motion, movant shall rely upon the accompanying Memorandum of Law, and all pleadings and proceedings on file.

**PLEASE TAKE FURTHER NOTICE** that the proposed form of Order granting this Motion is submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that defendant Milton Sundbeck requests oral argument.

Date: December 23, 2016

Respectfully submitted,

By: s/ John S. Mairo  
John S. Mairo

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